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12 *Attorneys for Defendant
13 Towers Unlimited Inc.*

14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 KEVIN BARTON,
17 v. Plaintiff,
18 TOWERS UNLIMITED INC., a Foreign
19 Corporation, and DOES 1 through 20,
20 inclusive,
21 Defendants.

22 Case No.: 2:16-cv-00823-JAD-VCF

23 **STIPULATION TO EXTEND TOWERS
24 UNLIMITED, INC. TIME TO FILE AN
25 AMENDED ANSWER**

26 **FIRST REQUEST**

27 COMES NOW, Defendant Towers Unlimited Inc. ("Towers"), by and through its
28 attorneys, the law offices of LIPSON, NEILSON, COLE, SELTZER & GARIN, P.C., and Kevin
Barton, by and through his counsel of record, Robert A. Goldstein, hereby agree and stipulate
as follows:

29 J Towers Unlimited, Inc.'s deadline to file an Amended Answer without leave of Court is
30 May 2, 2016;
31 J The parties are actively engaged in settlement negotiations; and
32 J In an effort to resolve this matter, the parties stipulate to allow Tower's Unlimited Inc.
33 until Monday, May 9, 2016, to file an Amended Answer.

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1 In compliance with Local Rule 6-1, the parties have good cause for this extension of time as
2 the parties have begun settlement discussions. This stipulation is made in good faith and as
3 an effort to facilitate resolution between the parties without incurring further fees and costs.
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6 LAW OFFICE OF ROBERT A.
7 GOLDSTEIN
Dated this 2nd day of May, 2016.

8 By: /s/ Robert A. Goldstein
9 Robert A. Goldstein, Esq.
10 10161 Park Run Drive, Suite 150
Las Vegas, Nevada 89145

11 Attorney for Plaintiff

5 LIPSON, NEILSON, COLE, SELTZER &
6 GARIN, P.C.
7 Dated this 2nd day of May, 2016.

8 By: /s/ Siria L. Gutierrez
9 Joseph P. Garin, Esq.
10 Siria L. Gutierrez, Esq.
9900 Covington Cross Dr., Suite 120
Las Vegas, NV 89144

11 Attorneys for Defendant
12 Towers Unlimited Inc.

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15 **ORDER**

16 **IT IS SO ORDERED.**

17 Dated this 3rd day of May, 2016.



18 **UNITED STATES MAGISTRATE JUDGE**
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